

**Organic Advisory Board
February 7, 2007
Mercato's Restaurant
Olympia, WA**

Members Present: Michele Catalano (Consumer Representative), Harold Ostenson (Double O Organics/Stemilt Growers), Dan Dufault (Emmanual Enterprises), Steve Hallstrom (Tolt Gardens), Andrea Pipitone (Pipitone Farm), Phil Unterschuetz (IFM), Jay Gordon (Gordon Dairy, Inc.), Luis Acuna (CF Fresh/OTA), Aaron Avila (GS Long),

Members Absent: David Granatstein (WSU), Jennifer Hall (Chef's Collaborative/NOSB), Harold Austin (Zirkle Fruit), Bob Pearson (R&K Foods), Dain Craver (Craver Organic),

Guests: John Doeblor – Eastside Tree Fruit Grower

WSDA Staff Present: Miles McEvoy, Les Eklund, Katherine Withey, Brenda Book, and Jerry Buendel

Recording: Brenda Book

Introductions and Announcements

Dan indicated he did not get a packet of handouts – need to check address!
Harold Ostenson submitted an updated address.

Organic Program Update – Miles McEvoy

- OFP Performance Goals
 - Direct Customers
 - Organic integrity
 - Timely
 - Paperwork
 - Communication
 - Financial
 - Expenses and Revenue goals (to include reserve, staff, equipment, database). Note: Database costs will be spread out through agency.
 - Process
 - Goal to have processes that comply with accreditation criteria and result in customer satisfaction.
 - Internal Customers (staff)
- Enforcement and Compliance – 2006 overview
 - Enforcement – Joint USDA/AMS and WSDA
 - Over 1200 National Organic Inspections
 - Over 100 inspections for EU or Japan
 - 57 Notices of Noncompliance for minor violations
 - 16 samples collected (cannot charge for samples per USDA regulation, concern by program that this number is low for 2006 – may be a data entry).
 - 53 surveillance inspections
 - 14 complaint investigations
 - 10 suspensions

- 3 revocations for willful violations
 - One civil penalty - \$1,000 (amount received does not recover costs of investigation and compliance)
 - Challenges – database limitations, unclear procedures, more training on investigations, inadequate staff to conduct surveillance inspections and investigate complaints, no funding for enforcement – fees come from certification services. However, program is dedicated to filling needs of certified operations and customer interviews have indicated that organic integrity is top priority for our certified operations.
- NOP Training Update – USDA has indicated that proceedings from the January 2007 certifier training will be sent out. However, we have not received these as of today.
- NASOP (National Association of State Organic Programs) Annual Meeting was held in January. One main focus was information about the 2007 Farm Bill proposals (specifically from the National Association State Dept. of Agriculture – NASDA).
- Senate Agriculture Committee Hearing – Upon request, the Organic Program and Board members provided a report to the committee at the end of January. Focus was on the twenty year anniversary of WSDA Organic Food Program – how far have we come, what are the issues and concerns the program is dealing with today. Report was very well received and supported.
- IFOAM accreditation audit of the program will take place at the end of February.
- Salmon – Safe Inspections. Staff had an informational meeting with the Salmon Safe organization at the beginning of February. Program is considering doing a pilot program in 2008 where Organic Inspectors would provide Salmon Safe inspections. Most of Salmon Safe operations are already certified as organic operations. Concerns are to ensure costs are covered and adequate staff is available. Concern is also to ensure that there is a need and demand from certified operations.

2006 Internal Audit – Carol Larson

- The Organic Food Program's Internal Audit was conducted between November 2006 and the first week of January 2007 by an outside auditor – Carol Larson (Quality Assurance Officer in Microbiology Lab).
- Internal Audit consisted of a review of office procedures as well as an inspection observance.
- Carol was very complimentary and impressed by the performance of the Organic Food Program - Only minor issues were identified.
- The Board reviewed the 2006 Internal Audit Report from Carol Larson, as well as the 2005 Corrective Action Plan.

Proposed Corrective Action Plan – Board feedback on priorities for the Internal Audit Corrective Action Plan:

1. Finish updating the procedures identified in the 2005 Internal Audit (EOVP, review procedures).
2. Better tracking system and follow up for Noncompliances, Needs Documentation requests.
3. Update and improve the filing system procedure. Sticky notes will be removed from material registration files.

4. Program should develop hard copy file locator system to track location of files when they are not in the file cabinets.
5. Need improvement in the sample procedures.
6. Develop system to encourage responses to requests for further information. (e.g. bill people for not responding to requests for information, phone calls).

Motion – To Accept the 2006 Internal Audit.

- Harold Ostenson Moved.
- Dan Dufault Seconded.
- Motion passed Unanimously.

Motion – To Accept Proposed Corrective Action Plan as discussed today.

- Luis Acuna Moved.
- Aaron Avila Seconded.
- Motion passed Unanimously.

Material Program Update

- Material Registration Program – Fee Increase Discussion
 - Program is growing at substantial rate.
 - Challenges with limited staff and unsupported database
 - Increased fees would enable development and expansion of program.
 - Katherine Withey presented three different increase proposals for discussion.
 - Logo needs revision to ensure it cannot be confused with the Certification Logo
 - Difficulties with changing the logo due to fact that material registrants are currently using it – cost of label reprinting by companies.
 - How would it be changed... use the word “approved” (some materials are restricted and not fully approved), use “registered” (all fertilizers and pesticides must be registered by WSDA).
 - Suggested that label design could be put out to the public... as a marketing contest!
 - Inspections
 - Have authority to conduct inspections under current regulation.
 - Has become clear that inspections should be a part of the registration program.
 - Questions about authority to conduct inspections outside the state.
 - Concerns on having the resources and inspector expertise to implement.
 - Proposed that inspections would be charged separately (not part of regular registration fees)
- To Implement Rule Change for 2008 (fee increase, inspections, logo) –
- Pre-proposal by Mid March (specific logo not needed by pre-proposal)
 - Final Proposal by July

Motion – The OFP should proceed with highest fee proposal as presented (increase fees by \$150, and increase by \$250 for livestock materials).

- Andrea Moved
- Phil Seconded
- Motion passed unanimously

Motion – The OFP should proceed with proposal to revise the material registration logo.

- Dan Moved
- Steve Seconded
- Motion passed unanimously

Other Material Program Issues:

- Liquid Fertilizer Compliance Discussion
- Program is discussing the possibility of contracts with other certifiers to evaluate materials on their behalf (specifically CCOF).
- Kaligreen – Potassium Bicarbonate
 - Not allowed for European Program in 2007.
 - However, a request has been made for an allowance of Potassium Bicarbonate to the EU authorities – result of this request will take some time.
- Treated Posts
 - Board passed a proposal to adopt a treated wood policy at last meeting that would allow the wrapping of posts with plastic/concrete. Prior to implementing, the OFP staff stated that NOP would first be consulted.
 - NOP has stated that use of treated posts on an organic operation does not meet the standards.
 - April Quarterly Report will contain updated OFP policy on treated wood/posts.
 - Discussion around frustration with inconsistency in policy (with trellis systems versus livestock, with transitioning new orchards in that have used treated wood).
 - OAB input will be requested before the April report goes out.

International Issue Updates

- Report from Rome on Organic Certification Conference
- Verifying transitioning times – Certification Body Forum
- New EU Rule
 - Revised Import Process to go into effect 12/2007.
 - The revision will change how certifiers get approval from EU authorities.
- Revising EOVP Additional Requirements for Equivalence to IFOAM Basic Standards and EEC 2092/91
 - The program will be proceeding with an evaluation of the EOVP Additional Requirements and revisions to ensure they are in line with the current EEC 2092/91 and IFOAM Basic Standards. Revisions will be taking place during 2007; drafts of the revised standards will be brought to the OAB in Fall 2007, to be implemented for the 2008 certification year.
- Canada's New Organic Law
 - Canada has developed a national organic standard to be fully implemented 12/2008.
 - The regulation is more similar to IFOAM and EU regulations rather than the US standard.
 - Unless, USDA and Canada come to an equivalency agreement, agencies certifying operations in Canada AND certifying products that are imported into

Canada must be accredited by the Canadian Government and the products must specifically be certified to the Canadian Organic Standard.

Flooding and Other High Water Events

- Overview of how flooding events may or may not affect organic certification – Miles shared a write-up regarding the program's interpretation.
- In short - A majority of the time, the issue is a food safety and FDA issue rather than an organic compliance issue.
- If there was a flooding issue that affects organic status, a temporary variance by USDA may be utilized (as noted in the regulation).
- The OAB agrees with the program's interpretation of how flooding events are being evaluated in regards to organic certification.
- The program will ensure staff understands this interpretation as inspections are done in Western WA during 2007 (after 2006 flood).

Organic Advisory Board Business

- Approval of October 2006 Meeting Notes

Motion – To approve October 26, 2006 minutes as written.

- Luis moved
- Michele seconded
- Passed Unanimously

- Board Membership
 - Two Applications have been received since the last meeting:
 - Don Odegard – Watts Brothers Farms
 - Eiko Vojkovich – Skagit River Ranch
 - Decided not to vote on applications at this time, but rather invite the applicants to the April meeting.
 - Re-appointments
 - Dan Dufault
 - Steve Hallstrom
 - Aaron Avila
 - Phil Unterschuetz – Vice Chair Position

Motion – To reappoint Aaron Avila, Steve Hallstrom, and Dan Dufault for another three year term – through January 2010.

- Andrea moved
- Jay seconded
- Passed unanimously

Motion – To reappoint Phil Unterschuetz as vice-chair for another term – through January 2008.

- Jay moved
- Michele seconded
- Passed unanimously

- Agenda Items for Future Meetings – see Task Summary below.
- Next meeting –
 - April 24th – East Side – suggestions are Ellensburg, Wenatchee, Yakima
 - June Conference Call – June 5th 3-5pm

- October 23rd – location to be determined.

Open Forum

- Livestock Conversion Letter
 - It was agreed that it is not the program or the Board's role to sign onto this letter.
 - However, it is important that the information is out to the OAB regarding the issue.
- Notice of Noncompliance for sample residues – seems harsh.
 - Suggestions to not send NONCs out on Thursdays or Fridays so a grower does not get a certified letter on a Saturday (when they cannot call the office).
 - Suggestions to provide a cover letter to NONC explaining what NONC is, or a phone call before sending one out.
 - There is not an interest in changing the policy around when an NONC is issued.
- Grower Meetings
 - Kudos to Les and Linda on GS Long grower meeting – attendance doubled for 2007 and was very well received!
 - Livestock/grain grower meetings are being put together by Katherine Withey and Jay Gordon. The need and demand for organic grain and hay is drastically increasing. Hope is to spur interest in growing organic feed for livestock rather than importing feed from abroad.

Handouts:

- Agenda
- WSDA Organic Food Program – Performance Goals
- 2006 Internal Audit
- 2005 Internal Audit Corrective Action Plan
- Chapter 16-160 WAC Registration of Brand Name Materials for Organic Food Production
- 2007 Material Applicants by State
- Material Registration Fee Proposal Spreadsheet
- Materials Discussion Handout
- EOVP Producer Additional Requirements
- EOVP Handler and Processor Additional Requirements
- EOVP Allowed Ingredients and Processing Aids List
- October 26, 2006 OAB Meeting Notes
- Applications for Potential Board Members

Motions Summary:

Passed Motions -

- To Accept the 2006 Internal Audit.
- To Accept Proposed Corrective Action Plan as discussed during today's meeting.
- To approve October 26, 2006 minutes as written.
- To reappoint Aaron Avila, Steve Hallstrom, and Dan Dufault for another three year term – through January 2010.
- To reappoint Phil Unterschuetz as vice-chair for another term – through January 2008.

Tasks Summary:

- Staff will look into use of large manilla envelopes. Board has indicated that all correspondence is still coming in large envelopes rather than small business envelopes.
- Staff will bring 2006 Internal Audit Corrective Plan to April Meeting
- April Quarterly Report will contain updated policy on treated wood/posts.
- The program will be proceeding with an evaluation of the EOVP Additional Requirements and revisions to ensure they are in line with the current EEC 2092/91 and IFOAM Basic Standards. Revisions will be taking place during 2007; drafts of the revised standards will be brought to the OAB in Fall 2007, to be implemented for the 2008 certification year.
- Katherine will send out OMRI password to OAB so they have access to the site.
- Staff will look into the following:
 - Suggestions to not send NONCs out on Thursdays or Fridays so a grower does not get a certified letter on a Saturday (when they cannot call the office).
 - Suggestions to provide a cover letter to NONC explaining what NONC is, or a phone call before sending one out.
- Agenda items for next meeting:
 - Fee increase proposal for handlers and processors
 - 2006 Internal Audit Corrective Action Plan
 - Follow-up on outstanding tasks and motions from October 2006 meeting - mandatory transitional certification, transitional labeling policy.
 - Final approval of material registration rule change
 - Proposal for handler/processor fee increases
 - Budget Review
 - Compliance officer position – funding
 - 2008 legislative package
 - Canada update
 - BioFach update